



288 NORTH PLANK ROAD, NEWBURGH, NY 12550

PHONE: (845) 566-4400 · FAX: (845) 569-0111 · TOLL FREE: (800) 610-4401 · (888) 2SSD-SSI

WEB SITE: WWW.DENNISKENNYLAW.COM · E-MAIL: DENNISKENNYLAW@CS.COM

DENNIS KENNY, ESQ. (NY & PA)

JEFFREY C. LEO, ESQ.

TARA L. JOHNSON, ESQ. (FL)

SCOTT T. BLACK, ESQ. (NY & CA)

EDWARD C. DELAUTER, ESQ.

KATHERINE M. USEWICZ, ESQ.

JOSEPHINE GOTTESMAN ESQ.

OF COUNSEL

EVAN M. FOULKE, ESQ. (NY & NJ)

VIA ECF

December 23, 2019

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 12/26/2019

HONORABLE VERNON S. BRODERICK

United States District Judge

United States Courthouse

40 Foley Square

New York, NY 10007

RE: Withus v. Commissioner of SSA
1:18-CV-10923(VSB) (JLC)

Dear Judge Broderick:

This office represents Plaintiff in the above-referenced Social Security appeal.

On 12/19/19, Magistrate Judge Cott issued a Report and Recommendation in which he recommended that Plaintiff's Complaint be dismissed and The Commissioner's motion for Judgement on the Pleadings be granted. Plaintiff's Objection to same is due on 1/2/2020.

Plaintiff now respectfully, with the kind consent of the Commissioner, seeks a 14-day extension of time within which to file her Objections. This request is due to earlier work deadlines which will come due prior to January 2, 2020. There has been no previous such request in this matter.

Should Your Honor allow this extension, the following amended deadlines are proposed, again with the kind consent of Counsel:

ADDITIONAL OFFICES AT:

3344 ROUTE 9 NORTH, 1ST FLOOR, POUGHKEEPSIE, NY

55 MAIN STREET, GOSHEN, NY | 303 CLINTON AVENUE, KINGSTON, NY | 18 COMPUTER DRIVE WEST, SUITE 109, ALBANY, NY

THE FIRM RESERVES THE RIGHT TO ASSIGN ALL MATTERS TO ANY MEMBER OR ASSOCIATE ATTORNEY

Plaintiff's Objections to the Magistrate Judge's Report and Recommendation would now be due on January 16, 2020.

Defendant's response to the Objections, if any would then be due on January 30, 2020.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ JOSEPHINE GOTTESMAN

Cc: Prashant Tamaskar, AUSA (via ECF)